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PROPOSED COUNSEL FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION	§	CASE NO. 21-30085-hdh11
OF AMERICA and SEA GIRT LLC,	§	
	§	
DEBTORS¹	§	Jointly Administered

DEBTORS' WITNESS AND EXHIBIT LIST
FOR HEARING TO BE HELD ON FEBRUARY 24, 2021

The National Rifle Association of American and Sea Girt LLC (the "Debtors") may call the following witnesses and introduce the following exhibits at the hearing scheduled on February 24, 2021 at 2:00 p.m. in the above-captioned proceeding (the "Hearing"):

I. WITNESSES

1. The Debtor reserves the right to call the following individual as witnesses at the Hearing:
 - a. Sonya Rowling
 - b. Robert Owens
 - c. Shawne Soto

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

- d. Linda Crouch
- e. David Warren
- f. Rick Tedrick
- g. John Frazer
- h. Michael Jean
- i. Patrick J. Neligan, Jr.
- j. Gregory Garman
- k. Michael Collins
- l. Jay Kyle
- m. Any witness(es) identified or called by any other parties; and
- n. Rebuttal witnesses, as necessary.

II. EXHIBITS

2. The Debtors reserve the right to introduce the following document as an exhibit at the Hearing:

EXHIBIT NO.	DESCRIPTION
1	Declaration of Shawne E. Soto in Support of Certain First Day Motions [Docket No. 10]
2	Declaration of Robert G. Owens in Support of Certain First Day Motions [Docket No. 11]
3	Declaration of Sonya B. Rowling in Support of Certain First Day Motions [Docket No. 12]
4	List of Debtors' Existing Bank Accounts - Exhibit B to Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Existing Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Business Forms [Docket No 5-2]
5	
6	

5	National Rifle Association of America Long-Term Reserves Oversight and Investment Policy (supersedes all prior policies) January 11, 2020 – Exhibit B to Debtors’ Motion for Waiver of the Requirements of Section 345(B) [Docket No. 78-2]
6	Declaration of Patrick J. Neligan, Jr. In Support of Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtors [Docket No. 82-2]
7	Declaration of John Frazer in Support of Application for Order Authorizing the Retention and Employment of Neligan LLP as Counsel to the Debtors [Docket No. 82-3]
8	Declaration of Michael J. Collins In Support of Application for Entry of an Order Pursuant to, <i>Inter Alia</i> , Section 327(E) of the Bankruptcy Code Authorizing and Approving the Employment and Retention Effective as of the Petition Date of Brewer, Attorneys & Counselors as Special Counsel for the Debtors and Debtors in Possession [Docket No. 84-2]
9	Declaration of Carolyn Meadows In Support of Debtors’ Application for Entry of an Order Authorizing and Approving the Employment of Brewer, Attorneys & Counselors as Special Counsel for the Debtors, Effective as of the Petition Date [Docket No. 84-3]
10	Declaration of John C. Frazer In Support of Application for Entry of an Order Pursuant To, <i>Inter Alia</i> , Section 327(E) Of The Bankruptcy Code Authorizing And Approving The Employment And Retention Effective As Of The Petition Date Of Brewer, Attorneys & Counselors As Special Counsel For The Debtors And Debtors In Possession [Docket No. 84-4]
11	Disclosure Pursuant to 11 U.S.C. § 329 and Rule 2016(B) of the Federal Rules of Bankruptcy Procedure of Compensation to Brewer, Attorneys & Counselors [Docket No. 84-5]
12	List of Ordinary Course Professionals – Exhibit B to Debtors’ Motion for An Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business [Docket No. 90-2]
13	Form of Declaration of Proposed Ordinary Course Professional – Exhibit C to Debtors’ Motion for An Order Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business [Docket No. 90-3]

14	Colliers International Tenant/Buyer Advisory and Representation Agreement – Exhibit 1 to Application for Order Authorizing The Employment Of Colliers International As The Debtors’ Real Estate Broker [Docket No. 115-1]
15	Declaration of Jay Kyle in Support of Application for Order Authorizing the Employment of Colliers International as the Debtors’ Real Estate Broker [Docket No. 115-2]
16	Declaration of Gregory E. Garman in Support of Debtors’ Application for Entry of an Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors [Docket No. 132-2]
17	Declaration of John Frazer in Support of Debtors’ Application for Entry of an Order Authorizing and Approving the Employment of Garman Turner Gordon LLP as Chapter 11 Co-Counsel for the Debtors [Docket No. 132-3]
18	Adoption Agreement for Eligible Tax Exempt 457 Plan
19	Eligible 457 Plan
20	Executive 457(f) Retirement Plan – Adoption Agreement
21	Executive 457(f) Retirement Plan – Plan Document
	Any exhibit(s) offered or introduce by any other parties
	Rebuttal exhibits, as necessary

3. The Debtors reserve the right to supplement this Witness and Exhibit List.

Dated: February 19, 2021

Respectfully submitted,

/s/Patrick J. Neligan, Jr.

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PROPOSED FOR THE DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 19th day of February 2021 a true and correct copy of the foregoing was served electronically via this Court's CM/ECF notification system.

/s/ John D. Gaither

John D. Gaither